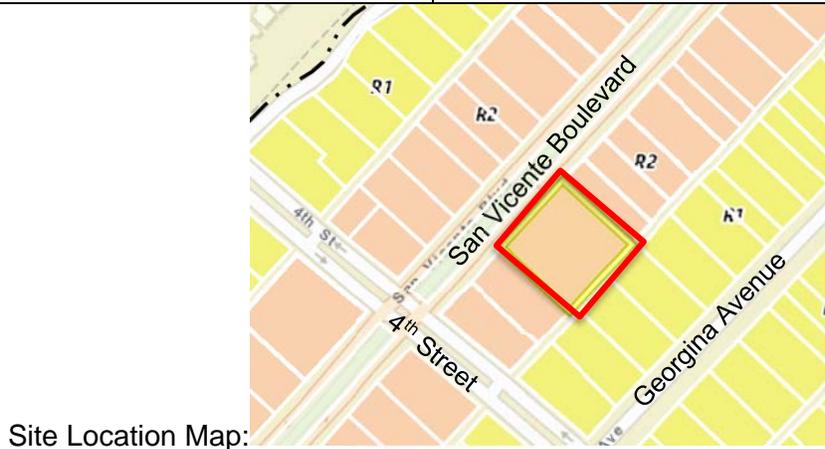




Planning Commission Report

Planning Commission Meeting: October 21, 2020		Agenda Item: 9A
To:	Planning Commission	
From:	Jing Yeo, AICP, City Planning Division Manager	
Permit:	19ENT-0250 (Conditional Use Permit); 20ENT-0066 (Minor Modification)	
Address:	438 San Vicente Boulevard	
Applicant:	Carlthorp School/ Ken Parr	
Subject	Conditional Use Permit requests to allow 6,477 square foot expansion and new rooftop playcourt to Carlthorp Elementary School with a Minor Modification for increased parcel coverage (45.05% total).	

Zoning District	Low Density Multifamily Residential (R2)
Land Use Element Designation	Low Density Housing
Parcel Area (SF)/Dimensions	46,362 SF / slightly irregular lot approximately 217.6' W x 213.09' D
Existing On-Site Improvements	Private elementary school, outdoor play yard, surface and covered parking.
Rent Control Status	N/A - School
Adjacent Zoning Districts & Land Uses	North: R2 – Multi Unit Dwelling East: R2 – Multi Unit Dwelling South: R1- Single Unit Dwelling West: R2 – Multi Unit Dwelling
Historic Resources Inventory	Subject property is listed as a non-contributing building within the San Vicente Boulevard Courtyard Apartment Historic District



Site Location Map:

Recommended Action	1. Approve Minor Modification 20ENT-0066
	2. Approve Conditional Use Permit 19ENT-0250
	3. Adopt the Statement of Official Action

Executive Summary

Proposed is a new 6,477square-foot school addition comprised of a 4,793 SF basement multi-purpose room, 844 SF lunch seating area, 840 SF of administrative offices; a 9,142 square-foot rooftop playcourt is also proposed and while not defined as floor area, is included under the proposed amendment to the Conditional Use Permit as a change in the use of a school building. If approved, the proposed project would result in a two-story school classroom building comprised of a 21,080 SF first story, an 11,454 SF second story, and a 17,851 SF basement area.

The proposal requires approval of a Conditional Use Permit and a Minor Modification in conjunction with the proposed expansion of the existing school, including the following:

- An amendment to Conditional Use Permit 95-012 which permitted a private school within the R2 zoning district; and
- An increased parcel coverage from the maximum allowable 45% to 45.06%

Pursuant to Santa Monica Municipal Code (SMMC) Section 9.41.060, Conditional Use Permits may be granted with respect to development standards upon the discretion of the Planning Commission.

A Conditional Use Permit is intended to provide a mechanism for approval or conditional approval of expansions in the use of land or building or changes in the character of use of land or building. These uses require an additional level of review and have a higher threshold of approval to ensure compatibility with adjacent land uses and compliance with the goals and intent of the General Plan.

The project’s proposed parcel coverage of less than one percent (.06%) over the 45% permitted threshold, requires a Minor Modification to the R2 development standard.

The Minor Modification request would normally be an administrative permit reviewed and issued by staff; however, pursuant to SMMC Section 9.37.170, if any application is filed concurrently with another application that would normally be reviewed by the Planning Commission, all related applications are reviewed by the Planning Commission. In this case, a Conditional Use Permit request requires Planning Commission action, and therefore, the associated Minor Modification will be reviewed concurrently under one review authority

The following issues should be considered by the Planning Commission in its review of the proposed Conditional Use Permit and associated Minor Modification requests for the proposed project:

- The proposed use is consistent with the General Plan;
- The proposed use is compatible with any of the land uses presently on the subject parcel if the land uses are to remain;
- The proposed use is compatible with existing and permissible land uses within the District and the general area in which the proposed use is to be located which may include but not be limited to size, intensity, hours of operation, number of employees, or the nature of the operation;
- The physical location or placement of the use on the site is compatible with and relates harmoniously to the surrounding neighborhood.

As detailed in this staff report and in the draft Statement of Official Action (Attachment B), all of the required findings for the Conditional Use Permit and Minor Modification can be made in the affirmative for the proposed project with the inclusion of conditions of approval as recommended.

This item was originally scheduled to be heard at the May 21, 2020 Planning Commission meeting but was continued to allow Code Enforcement to investigate a neighbor's allegation the school was operating in violation of their existing Conditional Use Permit (CUP 95-012). On June 4, 2020 Code Enforcement informed the school's representatives that they did not initiate an investigation as the concerns were not under their purview. The Code Enforcement Division reviewed the complaint letter from a concerned party and took no action. Due to the uncertainty resulting from the COVID-19 emergency, this item was rescheduled anticipating the school would be operating with in person learning for students with on-site teachers and facility. Presently, all classes are being conducted remotely, and there is no definite timeline for a hybrid of on-site and remote learning class.

Background

Existing Conditions

Carlthorp School was established in 1939 and has been in operation at its present location since 1941. The school is a private kindergarten thru 6th grade (K-6th) elementary school. Subsequent to the 1994 Northridge Earthquake, the school expanded in lot size and building floor area after acquiring and demolishing an adjacent, vacant 17-unit apartment building that was "red-tagged" or deemed structurally unsound. On June 12, 1996 the Planning Commission approved the following entitlements:

- Development Review Permit 95-003;
- Conditional Use Permit 95-012;
- Variance 95-022;
- Certification of an Environmental Impact Report and Adoption of Statement of Overriding Considerations

The project required the approval of a Development Review Permit for a 28,923 SF addition, a Conditional Use Permit for operation of a school in an R2 District, a Variance to allow tandem parking and allow an 8'-0" high chain link fence in the front yard and Certification of the Environmental Impact Report with Adoption of Statement of Overriding Considerations for significant unavoidable adverse short-term noise impacts during the construction phase of the project. There were special conditions related to mitigating construction impacts and a requirement to replace the windows in the adjacent multi-family building to the west to mitigate sound transmission. Additional special conditions related to the school operations to mitigate regular school noise included staggering recess and play times, dispersing play groups, landscaping the playfield with grass, and constructing a 6'-6" high acoustical barrier at the west and east property lines in conjunction with play areas. Landscaping the school perimeter with tall trees and heavily vegetated shrubs to block the view of play areas was also required. The applicant has complied with all special conditions.

Currently the school is developed with a 41,920 SF building consisting of a 19,030 SF first floor, a 10,614 SF second floor, and a 12,272 SF basement to include 22 classrooms, outdoor play yard, storage, offices, faculty lounge, library, restroom facilities, ancillary school rooms and parking.

The current operational conditions approved under Development Review Permit 95-003 and Conditional Use Permit 95-012 will be discussed in the analysis portion of this staff report.



Site location view from San Vicente Boulevard

The subject property is located in the Low Density Multi-family Residential (R2) Zone District on a rectangular parcel of 46,362 SF, situated on the south side of San Vicente

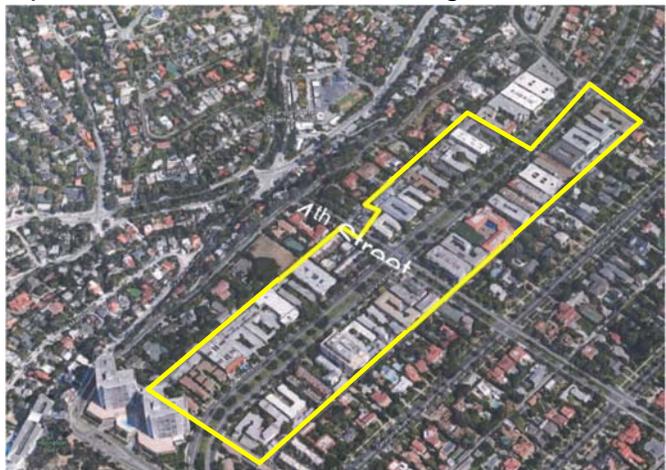
Boulevard between 4th and 7th Streets. The 45,362 SF parcel is surrounded by multi-family properties to the east (22-unit condominium) and west (24-unit apartment) and two single-family dwellings located across from Georgina Place Alley to the south. As noted in the background section of this report, the school acquired and expanded onto an adjacent property in 1996 and thus the school parcel is larger than any other parcel on this block.



Aerial 3D rendering looking south from San Vicente Boulevard

San Vicente Boulevard Courtyard Apartment Historic District

City Council designated the San Vicente Boulevard Courtyard Apartment Historic District on January 12, 2016. The Historic District was adopted based on its association with multi-family development patterns and the distinctive concentration of courtyard apartments with L-, O-, I-, C-, or U-shaped plans that partially or fully surround a landscaped courtyard. The district's period of significance are courtyard apartments constructed between 1937-1956 and have architectural styles typically associated with this era. The subject parcel is one of thirteen non-contributing structures out of 40 total structures within the District. The Carlthorp School is a non-contributing structure and parcel as the school was constructed outside the period of significance and is not a courtyard apartment. Currently, the Landmarks Commission reviews and issues Certificates of Appropriateness for both contributing and non-contributing structures in the District. As a result, the project had a preliminary review by the Landmarks Commission on October 14th, 2019. The Commission was generally supportive of the project, noting that the addition would not be visible from the street.



Although school is a non-contributor to the Historic District, until such time as there is an ordinance setting forth review procedures for alterations within the District, the Landmarks Commission must review all alterations through a Certificate of Appropriateness process. The Landmarks Commission will conduct its formal review of a Certificate of Appropriateness application including compatibility with the overall District character.

Project Analysis

Project Description

The request is to add 6,477square feet to the existing Carlthorp Elementary School expanding the first, second and basement levels. While not counted as floor area, the project also includes a new rooftop playcourt on the building adjacent to Georgina Place North alley.

Conditional Use Permit (CUP)

Pursuant to SMMC Section 9.08.020 (R2 district), an addition to an existing school requires approval of a Conditional Use Permit. The project must comply with the standards of the R2 District including height, setbacks, parking, and parcel coverage as well as other development standards.

Acoustical Analysis of Rooftop Playcourt

Due to noise concerns that were raised in the course of deliberations on the school's prior entitlements and the proximity of the proposed rooftop playcourt to adjacent residential uses, staff requested an acoustical analysis of the potential impacts of the rooftop playcourt on neighboring residents. The applicant provided an acoustic noise analysis prepared by Veneklasen Associates which measured existing exterior noise levels, the projected noise levels upon completion of the proposed outdoor improvements, and suggested mitigation measures to ensure the project complies with applicable Santa Monica Municipal Code (SMMC) noise requirements and the threshold established for ambient noise levels in a residential zone. This analysis dated May 27, 2020 is attached to this report (Attachment E).

The report analyzed the potential disturbance to adjacent neighbors due to noise from outdoor play by the K-6 elementary students. The analysis identified that the typical school hours are 8 am - 4 pm; however, the report used the hours of 7 am to 10 pm to study noise levels in a residential zone (Noise Zone 1). The study uses ambient noise conditions, a maximum event (the highest noise level), and a specified limit to analyze a threshold of significance.

The acoustic measurement included the ambient conditions and existing outdoor playground conditions at the school taken from Georgina Place North Alley and the two neighboring residential building to the east and west. These locations represent the closest residential property line to the proposed outdoor play court. There are three receiver sites studied located to the adjacent residential properties to the south, east and west of the school. The report's quantified analysis calculates the average and maximum dBA levels based on the height of the proposed play court and the noise limits set forth in the Noise Ordinance for adjacent receiver sites.

Based on the noise data collected, the report recommends a perimeter sound barrier surrounding the roof top play court, which is included in the design as a solid 6' high wall. The applicant's original design and subsequent updated design include plexi-rectangular punctuations into the upper playcourt wall. The walls are designed of a solid material of wood framing with stucco finish as recommended, with openings that have clear acrylic material. Absorptive panels could be incorporated into the design, but are not required, since the noise level limits are not exceeded. Staff has included Condition #11 requiring implementation of the recommendations contained in the Veneklasen report and to verify the assumptions made in the report with a noise test upon completion of the play court and active use by the students. The test results shall be analyzed and compared with the assumptions made in the report dated May 27, 2020. If additional impacts are found, or the analysis indicates the City's Noise significance threshold are exceeded, the applicant shall work with the Planning Director to mitigate those impacts. In addition, the applicant shall be required to designate an on-site contact person to serve as a neighborhood liaison to address any neighborhood concerns related to the school. Condition #12 reflects this requirement.

Phased Construction

The applicant has requested a five-year term to exercise rights granted under the entitlements to allow for phased construction to complete the project. Staff recommends approval of the five-year term as the school needs the additional time to fundraise for the improvements and also needs to phase construction to occur only during summer break (May to August) in order to minimize operational disruption during the school year. The outline below describes the scope of work and anticipated project phasing

- Summer Phase #1
 - Excavation and foundation work for the multi-purpose room, which will be capped over to return the playfield to normal use during the subsequent school year
 - Initial structural work for the upper-level play court
 - Modest courtyard and play field work to return the campus to usable condition
- Summer Phase #2
 - Final exterior work on the multi-purpose room and interior fit-out
 - Substantial completion of upper-level play court
 - Modest courtyard and play field work to return the campus to usable condition
 - Interior renovations to existing campus buildings
- Summer Phase #3
 - Completion of interior renovations to existing campus buildings, including completion and integration of multi-purpose room and upper-level play court
 - Interior courtyard improvements

Staff has included Condition #18 a term of five years to phase construction. In addition, pursuant to the 3rd revised 18th supplement to the Executive Order, permits approved

between March 13, 2020 and the expiration of the Executive Order are extended for an additional two years. Condition #14 also requires a Construction Management Plan per SMMC 8.98.40 to ensure impacts to the adjacent neighbors during construction will be minimized.

Proposed Revisions to Conditions of Approval for Existing CUP

The applicant proposes to amend certain operational conditions of approval for CUP 95-012. The prior conditions of approval contained in the June 12, 1996 Statement of Official Action (STOA) for CUP 95-012 are included as Attachment F. Specifically, the operational conditions detailed in conditions #39- #40; #49, #56- #60 of STOA CUP 95-012 include:

- A Mobility approved drop-off and pick-up plan
- Use San Vicente Boulevard for loading between 8 am – 5 pm
- Stagger out-door play time
- Disperse (exterior) noise sources by dispersing play groups
- Landscape to block views into the school play yard
- Play yard surface material for noise attenuation
- Construction of a 6-6” acoustical barrier
- Additionally, a condition was added requiring laminated glass installation on the apartment building to the west

School Drop-Off and Pick-Up (CUP 95-012 Conditions #39-40, CUP 19ENT-0250 Proposed Conditions #5 & #6)

The key conditions of approval for a school located within a residential district include noise mitigation, drop-off and pick-up plans, parking, and site design. The proposed project’s drop-off and pick-up plan will be enhanced and require approval by the Mobility Division prior to issuance of a building permit. Conditions #5-7 for the currently proposed amendment to the CUP, optimize the existing drop-off and pick up plan through the use of San Vicente Boulevard and the alley as a loading zone and ensure compliant bike parking will be added prior to issuance of a building permit.

Special Events (CUP 95-012 No Conditions; CUP 19ENT-0250 Proposed Conditions #4)

CUP 95-012 did not include any conditions relating to the number or type of special events the school may hold. With the addition of a multipurpose room intended to host events, staff included Condition #4 to specifically address the number of special events the school may have to minimize the potential noise or parking and circulation impacts to the adjacent neighbors. After the May 2020 staff report was published, the applicant provided a sample list of potential special events (Attachment I) and requested the number of persons constituting a special event be increased from 35 to 50 (Attachment I). The request to increase the number of adults attending these events was based on the typical number of adult participants in the events. The request continues to be to allow 18 special events per academic year, which equates to approximately 2 events per month.

Staff considered the special events request and agrees with increasing the participant threshold by which special events are defined in an effort to balance the school's operations with the potential impacts to adjacent neighbors resulting from these events with the modifications proposed in Condition #4, which include conditions regarding drop off, bicycle parking, and transportation-related conditions to address any adverse impacts generated by automobile trips. As previously noted, the proposed multipurpose room has a larger seating capacity than other rooms so Conditions #5 and #6 require the school to work with the Mobility Division prior to a special event within the multipurpose room for invited guests, parents or other members of the public that typically do not work, study or facilitate the school's daily operations.

Landscape Material of Playfield – CUP 95-012 Condition #59; CUP 19ENT-0250 Proposed Condition #15)

Since the May 2020 Planning Commission staff report was published, the applicant has requested an amendment to the CUP 95-012 condition which required a grass playfield in order to mitigate potential sound impacts from the playfield. The school replaced the grass field approximately 15 years ago in an effort to be more sustainable, reduce turf replacement costs, and provide a surface that would hold up better in inclement weather. Therefore, the applicant has requested Condition #15 allow a grass or artificial turf playfield. Staff concurs in that the intent of the condition to require a grass field “was a noise mitigation measure to reduce the amount of hard surface material and absorb sound”. For the reasons stated, staff is recommending artificial turf be included as an allowable material for the playfield as drafted in condition #15.

The prior CUP conditions include landscape, a 6'-6" acoustical barrier wall on the east and west ends of the ground level play field and staggered play times and modified play areas to disperse the noise source (children) during outdoor play. The landscape has been installed, the acoustical barrier wall built, and the play routines and outdoor play activities, have been replaced with Conditions #8-12 that more appropriately address the use of existing outdoor amplified speakers.

Clear View Through Fence – CUP 95-012 Condition #61; CUP 19ENT-0250 Proposed Condition #41)

Condition #61 of the existing CUP prohibits the school's front yard fence and landscaping along San Vicente Boulevard from obstructing a clear view through the fence into the school campus. The condition reads:

The front yard fence shall be constructed and landscaping installed and maintained so as not to obstruct a clear view through the fence.

CUP 95-012 was approved with an eight-foot high combination wall and fence in the front yard consisting of a three-foot high wall and five-foot high wrought iron fence with planted landscape material. At the time, the Zoning Ordinance permitted schools to have an eight-foot high chain link fence within the front setback [Section 9.04.10.02.080(b)(2)]. Current

Zoning Ordinance regulations for fences, walls, and hedges no longer includes this provision for schools and pursuant to Section 9.21.050(A)(1)(a) only a 42-inch front yard fence is permitted. Therefore, the existing eight-feet high fence is legal non-conforming.

The applicant has explained that the hedges were formerly transparent allowing a clear view into the playfield along the whole length of the fence on San Vicente Boulevard. However, in 2008, the school replaced the hedge with thicker ficus plantings thereby obstructing clear views into the school. The applicant has shared that this was done in line with recommendations from the Santa Monica Police Department and their insurance carrier in order to prevent people who might seek to harm or disturb students having a clear view into the campus. As a result, the applicant has requested to remove the requirement that there be a clear view through the fence due to concerns that public visibility into the school campus poses a potential threat to student safety.

Staff has reviewed this request within the purpose of the City's regulations with respect to front yard fences, wall and hedges and also comparability with other schools. The regulations differentiate between allowable heights in front yards compared to side and rear yards by limiting the height of fences, walls, and hedges within front yards to 42 inches and allowing greater heights up to 8 feet (12 feet for hedges) in side and rear yards. This differentiation seeks to acknowledge the role of front yards in establishing neighborhood character, pedestrian orientation, safety and impacts to neighbors. With respect to safety and security, greater visibility into areas through a front yard generally promotes neighborhood awareness and can enhance safety and security. Staff also reviewed other public and private schools in Santa Monica and found that it is quite common to have school playfields secured with chainlink or similar transparent fencing that allows clear views into the school. As a result, staff does not support changes to the original condition of approval requiring the fence and landscape to have a clear view through the fence.

Minor Modification

The Minor Modification request is for an increase to the permitted parcel coverage in the R2 zoning district that allows no more than 45% parcel coverage of the ground floor building footprint. Approval of the proposed Modification requires that the Planning Commission make all five required findings pursuant to SMMC Section 9.43.090. A decision to grant a Minor Modification shall be based on the following findings:

- The approval of the minor modification is justified by site conditions, location of existing improvements, architecture or sustainability considerations, or retention of historic features or mature trees;
- The requested modification is consistent with the General Plan and any applicable area or specific plan;
- The project as modified meets the intent and purpose of the applicable zone district and is in substantial compliance with the district regulations;
- The parcels sharing common parcel lines with the subject parcel will not be adversely affected as a result of approval or conditional approval of the

minor modification, including but not limited to, impacts on privacy, sunlight, or air; and

- The approval or conditional approval of the minor modification will not be detrimental to the health, safety, or general welfare of persons residing or working on the site.

The school currently has 42.6% parcel coverage. With the enclosure of an 844 sf existing roofed but unenclosed lunch area and two new elevators (totaling 276 sf) required for disabled access, the parcel coverage increases to 45.06%, which is 26 SF over the maximum allowable parcel coverage necessitating the Minor Modification request. Excluded from parcel coverage calculations per SMMC Section 9.04.100. are eaves, permitted projections and projecting upper-story outdoor spaces.

The Minor Modification request for a modest increase in parcel coverage is requested for the addition of two new elevators to allow for disabled access, a stair, and enclosure of an existing outdoor roofed lunch area. By granting the parcel coverage increase, the proposal will not impact the adjacent properties with regard to privacy, sunlight and air since all these areas are located within the buildable footprint of the parcel and are not adjacent to the property lines or encroach into required setbacks. Additionally, this area, shown in blue in the site plan below, is buffered by existing school buildings, further minimizing any potential impacts to surrounding buildings and residential uses.

The required parking for an elementary school is 2 spaces per classroom per SMMC Section 9.28.060. The proposed addition includes the following areas:

- 4,793 multipurpose room and associated corridors;
- 844 SF enclosed lunch area
- 840 SF administrative offices



Rear elevation and parking from Georgina Place North Alley

The elementary school off-street parking standard is inclusive of administrative offices and non-classroom areas that are considered ancillary to the school's operation, particularly in an elementary school as the children do not drive. The new multipurpose room will be used for art and theater performances, assemblies, events such as speaker lectures or graduation. Based on the intended use (see Attachment J), staff determined the multipurpose room would not be considered a new classroom since the existing daily operations will not change nor will there be an increase in student enrollment. As it is not a classroom, no additional parking is required. Condition #17 has been proposed that prohibits use of the multipurpose room as a classroom. While there may be Special School Events that draw adults other than School administrators and faculty throughout the year, staff has further determined that the multipurpose room does not constitute a Community Assembly use as defined in Section 9.51.030(A)(5) of the Zoning Ordinance. Community Assembly spaces are for public and private meetings that are typically open to the general public such as banquet centers, community centers, and civic auditoriums. The proposed multi-purpose room is intended for School-related uses only and will not be available for the general public's use. Thus, Condition #4 provides a limitation to the number of such special events and Conditions #4 and #6 include requirements for a bike and automobile valet plan submitted to the City Mobility Division at least 72 hours prior to

a Special School Event. This plan shall include a narrative detailing drop-off, circulation, event hours, estimated persons in attendance, and off-site vehicle automobile staging.

Bicycle Parking

The project requires 32 bike parking spaces comprised of 11 long-term and 21 short-term stalls. Condition #7 has been added to ensure the bike parking is consistent with current City standards prior to the issuance of a building permit. In the published staff report dated May, 21, 2020 staff incorrectly calculated the long and short term bike parking requirements. Staff has confirmed with the Mobility Division, the correct analysis is being applied and Attachment A and Condition #7 has been adjusted to reflect this corrected analysis. The school currently has 12 bike racks located within the front yard setback, and eight stalls located within the covered parking area accessible from the alley. The proposed scope of work including added conditions of approval will help mitigate additional car trips and achieve compliance with the City’s Transportation Demand Management program and mitigate potential automobile parking demand. The bike parking requirements are consistent with the City’s Land Use and Circulation Element policies to provide alternative modes of transportation, including K-6 grade schools where children do not drive and may live outside a one-half mile radius typically used as a standard walking distance and will be provided on-site prior to issuance of a building permit. The Mobility Division has worked with the applicant to refine the initial design and identify additional requirements for both long- and short- term bicycle parking; on-site shower facilities. Staff has added Condition #7 to ensure the required bike parking and shower facility will be included in the first project phase.

	Existing	Required	Proposed
Vehicle Parking	32 spaces approved with Variance 95-022 tandem configuration	None; no new classrooms	34 spaces; existing legal-nonconforming (tandem configuration) operational parking, loading and circulations conditions added
Bicycle Parking	20 spaces	32 spaces (21 long term & 11 short term)	32 spaces

Vehicle and Bicycle Parking Requirements

Drop-Off and Loading Operations

Student drop-off and loading primarily occurs at the San Vicente Boulevard street frontage and occasionally from the Georgina Place North Alley. The current drop-off restrictions at both locations are:

- San Vicente Boulevard: Limited to loading and unloading between 7 am- 5 pm on school days for the entire street frontage;
- Georgina Place North Alley: Included in current pick-up/ drop-off plan but used less frequently and is an alternative drop-off site.

A Parking and Loading Operations Plan (PLOP) will be required to be approved prior to issuance of a building permit. The PLOP shall include a site plan, circulation features such as the location(s) where pick-up/drop-off occurs, path of travel from passenger loading locations in relation to the building entrance, how parking and loading will occur during times when the multipurpose room is used for public events and indicate how bicycle and automobile valet services are proposed to operate. The intent of the drop off/pick up plan is to prevent congestion and queuing problems via an organized operational system. Condition #5 will require a PLOP, a comprehensive, detailed plan in effect for the life of the project, i.e. for as long as the site operates as a school.



Upper level play court and lunch area enclosure view from interior courtyard looking south

Proposed Transportation Demand Management Plan

The project proposes a 6,477 SF addition. SMMC Section 9.53.130 establishes Developer Transportation Demand Management (TDM) requirements for non-residential projects exceeding 7,500 square feet. As a result, while the proposed project is required to comply with the TDM ordinance as an employer, including annual reporting, the developer requirements of preparing a TDM plan that includes both physical and programmatic features do not apply. A number of public comments have been received expressing concern about the school's management of vehicle trips and the resulting impact on the surrounding neighborhood, which is what a TDM program is intended to address. As a result, staff discussed this issued with the applicant and the applicant has voluntarily proposed to include a TDM Plan as part of the conditions of approval (Attachment H).

The TDM Plan includes pick-up and drop-off procedures, area traffic management of school-related trips, incentives to reduce vehicle trips for school employees along with a commitment to strive for an employee Average Vehicle Ridership of 2.0, and also establishes goals to maximize the number of student passengers vehicle. The applicant's

voluntary TDM Plan has been reviewed and accepted by Mobility staff and therefore, Condition #16 memorializes the requirement for a TDM Plan. This voluntary TDM Plan will provide additional support to address the potential traffic impacts that may result from the school's current Conditional Use Permit request.

Neighborhood Compatibility

Carlthorp Elementary School is located in the R2 Zoning District and is across the alley north of the adjacent R1 (Single Unit Dwelling) zoning district. On the east and west sides of the school are multi-unit apartment buildings. The school has operated at this location for 79 years, since 1941 enrolling about 280 students and 80 teachers/staff. While schools exist in other residential neighborhoods throughout the City, the level of compatibility of a school use located in a residential zone is reviewed and determined via the Conditional Use Permit (CUP) application process. This discretionary process allows the approving body, in this case the Planning Commission, to make a proposed use become more compatible with existing and adjoining uses by imposing appropriate conditions to minimize potential impacts of the use on adjacent neighbors. These potential impacts include noise (see acoustic analysis section above), parking, construction-related and traffic congestion that may occur during student drop-off and pick-up. Staff has included Conditions 1 thru 10 to address parking and loading, noise and construction impacts.

Staff has included Condition #4 to specifically address the number of special events the school may have to minimize the potential noise or parking and circulation impacts to the adjacent neighbors. The proposed multipurpose room has a larger seating capacity than other rooms and Conditions #4 and #6 require the school to work with the Mobility Division prior to a special event within the multipurpose room for invited guests, parents or other members of the public that typically do not work, study or facilitate the school's daily operations.

The proposed expansion includes additional square footage below grade in a basement level, on the ground floor, and on the second floor. The design of the building will be reviewed by the Landmarks Commission through the Certificate of Appropriateness process, and in its review, the Commission has the ability to condition exterior lighting, landscape, and design features to be compatible with and sensitive to the surrounding properties. The proposed addition complies with the R2 zoning district's development standards with the exception of the 45.06% parcel coverage increase as discussed in the modification section of this report. The addition will not be visible from the street, with the possible exception of the elevator overrun. Additionally, no exterior lighting is proposed for the upper level of the play court.

Zoning Ordinance Compliance

Carlthorp School is located in the R2 zoning district, which establishes property development standards that govern building's height, parcel coverage, and setbacks of the proposed addition. Furthermore, the R2 zoning district allows private and public schools with the approval of a Conditional Use Permit that is reviewed and approved by the Planning Commission.

The Zoning Ordinance contains specific development standards that apply to this R2 zoning district regardless of the use. With the exception of parcel coverage, identified in SMMC Section 9.08.030, the project will comply with the district's standard height, setback, parking, and unexcavated area for the proposed school expansion.

As proposed, except for the Minor Modification for parcel coverage request, the project complies with all remaining development standards applicable to the site within this zone. Attachment A to this staff report contains a detailed comparison of these development standards and the proposed project.

The project has been designed within the building height requirements and allowed projections permitted above the roof for the R2 Residential zone. The proposed upper level play court and second floor offices will be compliant with 30' height limit. The two-story upper play court is designed with a wall surrounding the perimeter as an acoustical barrier extending to a height of 29.5 feet high as measured from Average Natural Grade (ANG) and is below the allowable 30 feet flat roof height limit. Additionally, a 42-inch parapet is permitted above the 30' height limit. The acoustical wall has been designed to comply with the 30' district height limit. Typically, per SMMC Section 9.21.060 a solid parapet wall would add a safety barrier surrounding the parapet roof area. To address the potential for ball, play equipment, or other objects that may fall outside the containment area onto the alley or adjacent yard areas, staff has added Special Condition #13 to require a netting material to extend no more than 42-inches above the acoustical wall. The netting shall be designed and reviewed by Landmarks Commission staff. Additional permitted projections above the second floor roof-line include two elevator towers no more than 10' high and under the allowable 18' permitted for this projection.

Land Use and Circulation Element (LUCE) Consistency

The subject property is designated as Low Density Residential in the Land Use and Circulation Element (LUCE). The intent of this designation is to preserve and protect the existing character of the residential neighborhood through conservation, maintenance, and rehabilitation of existing structures and redevelopment of parcels consistent with Low Density Multi-family zoning standards which include schools subject to a Conditional Use Permit.

Santa Monica's schools and educational facilities are among the City's most important assets. They draw residents and visitors to the City, provide employment, and important recreational and cultural opportunities as well as training the City's young people for future service and employment.

The Land Use and Circulation Element (LUCE) includes policies and goals to encourage increased use of multi-modal transportation options. A particular focus will include enhanced use of the transit system and improvements to the City's bicycle and pedestrian facilities. The LUCE policies below focus on schools, neighborhood compatibility and circulation.

In conformance with LUCE, the project as conditioned, is consistent with the goals and policies regarding drop-off plans. Specifically, for schools:

- Policy CE15.1 Encourage schools to work with the City to develop and implement safe morning drop-offs and evening pick-ups of students that minimize the traffic impacts on City streets.
- Policy CE15.3 Work with providers to achieve pick-up and drop-off for childcare, early education, and private school projects that are designed and operated to be sensitive to neighbors and the surrounding area.
- Policy T25.1 Require adequate on-site loading areas for childcare centers, healthcare offices and other uses with intensive passenger drop-off demands, and work with schools to encourage provision of adequate loading areas.

The project is located in the San Vicente Boulevard Courtyard Apartment District as a non-contributor and will require Landmarks Commission design approval. The scale and character of the neighborhood is ensured by compliance with height and setback standards consistent with policy and goals:

- GOAL N8: Protect, preserve and enhance the attributes of the North of Montana residential neighborhood and ensure compatible design.
- N8.3 Preserving site planning attributes of San Vicente Boulevard, including: Protecting the landscaped median of San Vicente Boulevard, its coral trees and lawn—properly maintaining and replanting as needed; Preserving the pedestrian sidewalks lining the boulevard and the mature trees in the landscaped parkways; Maintaining consistent lot setbacks for new construction.

The project would comply with the goals and policies of the Neighborhood Land Use Designations maintaining, the existing neighborhood's distinctive character, design, and pattern of development that provide for a diversity of households and Conditional Permitted Uses

The project shall provide additional bike facilities, and is consistent with the goals and policies neighborhood compatibility identified including:

- N1.7 Make new development projects of compatible scale and character with the existing neighborhoods, providing respectful transitions to existing homes, including ground level open spaces and appropriate building setbacks and upper-floor step backs along neighborhood streets.
- GOAL N4: Ensure compatible design to preserve and enhance neighborhoods.
- POLICIES: N4.1 Design new development to be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height and scale toward adjacent residential structures.

The project is consistent with circulation policies and goals identified in the LUCE including:

- Policy CE7.1 Promote land use patterns and transportation decisions that enable all residents to walk and bicycle to meet their daily needs. Expand the bicycle network to provide residents with safe options for bicycling to stores, schools, parks and places of employment.
- GOAL CE14: Increase use of transit, walking and bicycling as an alternative to the automobile for students and employees of the city’s schools and colleges.

The requirements for additional on-site bike parking, shower facilities, and incentives for providing access to transit systems such as the Big Blue Bus for employees are consistent with the above goals and policies.

Community Meeting

The applicant has conducted outreach to the adjacent and the immediate neighbors in the following ways:

- December 2, 2019 community meeting held at the Montana Avenue Branch Library;
 - Notice of the community meeting was provided by e-mail to immediate neighbors to the east, west and south of the school in November 2019 and hand-delivered notices to neighbors east, west and south of the school;
- Follow up e-mails to those who attended the community meeting;
- Follow up with individual(s) requesting additional information

Staff has provided information to member(s) of the public requesting information including but not limited to: prior entitlement records, additional exhibits demonstrating code compliance, and application materials. Staff has also responded to general questions and direct requests for assistance from member(s) of the public. Generally, these request(s) focused on:

Concern	Response
1) Parking and loading during pick-up/drop-off	<ul style="list-style-type: none"> • Conditions # 4-6
2) Existing parking as related to compliance with current Code requirements	<ul style="list-style-type: none"> • Variance 95-012 (tandem); no trigger for additional parking
3) 95CUP-012 non-compliance	<ul style="list-style-type: none"> • Refer to Attachment G
4) Noise from special events and daily activity	<ul style="list-style-type: none"> • Conditions #4, 8-12
5) Condition #49 sound rated windows not sufficient to address daily noise issue	<ul style="list-style-type: none"> • Sound rated windows installed; ambient noise complies with Noise Ordinance per Acoustical Analysis
6) Lack of access to public records	<ul style="list-style-type: none"> • Public Records request filled, however, certain documents unavailable due to COVID-19 and City Hall closure

Environmental Status

The proposed project is exempt from the provisions of the California Environmental Quality Act (CEQA), pursuant to Section 15303 (Class 3) of the State CEQA Guidelines. This section exempts minor additions to existing schools where the addition does not increase original student capacity by more than 25% or 10 classrooms. The school's existing size is 47,709 square feet with a proposed addition of 6,477 square feet, a 15% increase in size that is intended to accommodate existing student capacity. The school has 22 existing K-6 classrooms and the addition will not add any new classrooms. Therefore, the addition, will not increase the number of classrooms or students and no further environmental analysis is required.

The proposed project is also categorically exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15331, Class 31 of the State Implementation Guidelines in that the proposed addition to a non-contributor in the San Vicente Boulevard Courtyard Historic District is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (2017), revised by Anne E. Grimmer, and would not cause a substantial adverse change in the significance of the San Vicente Courtyard Historic District. The District is characterized by courtyard apartments oriented around landscaped spaces constructed during an architectural period of significance dating from 1937-1956. The proposed project consists of a 6,477sf subterranean multi-purpose room and 844 sf lunch seating area and 840 sf of administrative offices within the interior courtyard of the existing building envelope that will not be visible from San Vicente Boulevard. Further, the proposed rooftop play area is on an existing building adjacent to the alley (approximately 170 feet from the North property line) and would be minimally visible from San Vicente Boulevard only due to required safety fencing. The proposed project does not change the existing front elevation or landscape features of the non-contributing school and therefore, would have no impact on the overall character or significance of the historic district. Further, the proposed addition requires review and approval of a Certificate of Appropriateness by the City's Landmarks Commission to ensure the structure would not potentially impact the character-defining features of the District.

Alternative Actions

In addition to the recommended action, the Planning Commission could consider the following with respect to the project if supported by the evidentiary record and consistent with applicable legal requirements:

- A1. Continue the project for specific reasons, consistent with applicable deadlines and with agreement from the applicant
- A2. Articulate revised findings and/or conditions to Approve OR Deny, with or without prejudice, the subject applications

Conclusion

Staff supports the request for approval of a Conditional Use Permit and Modification to allow an existing elementary school expansion of 6,477 SF and an increase to the allowable ground floor parcel coverage for Carlthorp, a private K-6 Elementary School.

The Minor Modification request is supported by staff and allows an increase the first-floor footprint with the proposed elevator access, enhanced circulation and the enclosure of an existing partially open lunch seating area. The Minor Modification will allow increase of 0.06% over the 45% permitted in the District. There would be little to no impact to the adjacent parcels with this request since these features are located outside of the required setbacks and internal to the site, and the enclosed seating area (currently designed with a roof covering) will be insulated to help dampen the sound and protect the students and faculty from inclement weather. The additional parcel coverage allowance is warranted.

As analyzed in this report, the required findings as set forth in SMMC Section 9.41.060 can be made in the affirmative to approve the requested Conditional Use Permit based on criteria such as the existing site and structure's unique design characteristics as detailed in the draft Statement of Official Action (Attachment B).

Additionally, conditions have been added to mitigate any impacts on adjacent properties including: a requirement for a Parking and Loading Operations Plan (PLOP), noise, bike parking and potential impacts during construction. As conditioned, approval of the requests affords the Carlthorp School the ability to add square footage below, at-grade and at the second-floor levels and as conditioned, the request is comparable to the adjacent residential uses within the area and will maintain the integrity of the neighborhood.

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Attachments

- A. General Plan and Municipal Code Compliance Worksheet
- B. Draft Statement of Official Action
- C. Public Notification & Comment Material
- D. Project Plans
- E. Applicant's Acoustical Noise Analysis by Veneklasen Associates, May 27 ,2020
- F. CUP 95-012 Statement of Official Action, June 12, 1996
- G. Applicant's Response to Compliance with CUP 95-012 Conditions of Approval, May 12, 2020
- H. Applicant's Draft Transportation Demand Management (TDM) Plan, October 13, 2020
- I. Applicant's Sample List of Potential Special Events for Carlthorp School
- J. Applicant's Description of Multipurpose Room for Carlthorp School